

ORDER NO. PSC-97-1459-FOF-TL  
DOCKET NO. 960786-TL  
PAGE 197

Act of 1996, as discussed in Section VI.K. of this Order. It is further

ORDERED that BellSouth is providing local dialing parity in accordance with Section 251(b)(3), pursuant to Section 271(c)(2)(B)(xii) of the Telecommunications Act of 1996, as discussed in Section VI.L. of this Order. It is further

ORDERED that BellSouth is providing reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2), pursuant to Section 271(c)(2)(B)(xiii) of the Act, as discussed in Section VI.M. of this Order. It is further

ORDERED that BellSouth has not provided telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3), pursuant to Section 271(c)(2)(B)(xiv), of the Telecommunications Act of 1996, as discussed in Section VI.N. of this Order. It is further

ORDERED that BellSouth has not developed adequate performance standards for unbundled network elements and for services offered for resale as discussed in Part VII of this Order. It is further

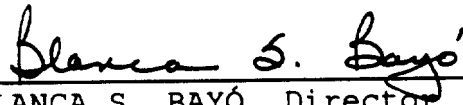
ORDERED that BellSouth has met the dialing parity requirements of Section 271(e)(2)(A) of the Telecommunications Act of 1996, as discussed in Part VIII of this Order. It is further

ORDERED that we do not approve BellSouth's Statement of Generally Available Terms and Conditions at this time as discussed in Part IX of this Order. It is further

ORDERED that this docket shall remain open.

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By ORDER of the Florida Public Service Commission this 19th  
day of November, 1997.

  
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BLANCA S. BAYÓ, Director  
Division of Records and Reporting

( S E A L )

MMB/BC

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

As identified in the body of this order, our action in Part IX is preliminary in nature and will not become effective or final, except as provided by Rule 25-22.029, Florida Administrative Code. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, as provided by Rule 25-22.029(4), Florida Administrative Code, in the form provided by Rule 25-22.036(7)(a) and (f), Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting, at 2540 Shumard Oak

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Boulevard, Tallahassee, Florida 32399-0850, by the close of business on December 10, 1997. If such a petition is filed, mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing. In the absence of such a petition, this order shall become effective on the date subsequent to the above date as provided by Rule 25-22.029(6), Florida Administrative Code.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Any party adversely affected by the Commission's final action in this matter may request reconsideration of the decision by filing a motion for reconsideration with the Director, Division of Records and Reporting within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code.



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Application of BellSouth Corporation,	)	CC Docket No. 98-121
BellSouth Telecommunications, Inc.	)	
and BellSouth Long Distance, Inc.	)	
for Provision of In-Region, InterLATA	)	
Services in Louisiana	)	

**Exhibit V:**  
**BellSouth's Comments on Interim Service Quality Performance Measurements**  
**In re: BellSouth Telecommunications, Inc. Service Quality Performance Measurements,**  
**LPSC Docket No. U-22252 (July 10, 1998)**



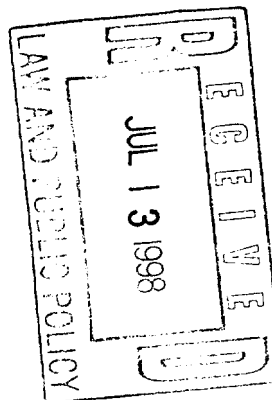
BellSouth Telecommunications, Inc. 504 528-2050  
Suite 3060 Fax 504 528-2948  
365 Canal Street  
New Orleans, Louisiana 70130-1102

Victoria K. McHenry  
General Counsel - LA

July 10, 1998

**BY HAND**

Ms. Susan Cowart  
Administrative Hearings Division  
Louisiana Public Service Commission  
P. O. Box 91154  
Baton Rouge, LA 70821



RE: LPSC, ex parte  
Docket Number U-22252-C  
In re: BellSouth Telecommunications, Inc. Service Quality  
Performance Measurements

Dear Ms. Cowart:

Enclosed are the original and one (1) copy of BellSouth's Comments on Interim Service Quality Performance Measurements to be filed into the record of the referenced matter. An additional copy is included which we ask that you please date stamp and return to me for our files.

With kind regards, I am

Sincerely,

Victoria K. McHenry

VKM/as  
Att.

cc: Service List (w/enc)(By Hand or Federal Express)

Doc#126147

**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**  
**Ex Parte**

**In Re: BellSouth Telecommunications,  
Inc. Service Quality Performance  
Measurements**

**Docket U-22252  
Subdocket C**

**BELLSOUTH'S COMMENTS ON INTERIM SERVICE QUALITY  
PERFORMANCE MEASUREMENTS**

On April 30, 1998, BellSouth Telecommunications, Inc. ("BellSouth") filed two revisions to its approved Statement of Generally Available Terms and Conditions, including adoption of Service Quality Performance Measurements derived from the Staff Recommendation adopted by the Georgia Public Service Commission in December of 1997 in Georgia Docket No. 7892-U. The Louisiana Public Service Commission ("LPSC") adopted on an interim basis the Service Quality Performance Measurements filed by BellSouth in Order No. U-22252-B, dated July 1, 1998. It also opened a rule making proceeding to evaluate the interim measurements, and directed the LPSC Staff to issue a recommendation addressing final measurements for the Commission's meeting on August 19, 1998.

BellSouth files these Comments in support of its position that the LPSC should endorse the measurements adopted on an interim basis with the few, proposed changes suggested herein. The total measurements supported by BellSouth herein are annexed as Attachment A. The few changes BellSouth proposes to make to the measurements filed on April 30, 1998 appear on the matrix attached as Attachment B. The proposed changes include (1) six additional measurements not included in the interim measurements (*Average Jeopardy Notice Interval, Coordinated*

*Customer Conversions, Average Completion Notice Interval* and three collocation measurements); and (2) proposed changes to three of the April 30th measurements to conform to format proposed by the FCC in its April 17, 1998 Notice of Proposed Rulemaking, CC Docket No. 98-56 (*Total Service Request Cycle Time, Service Request Submissions per Request, and Percentage Order Accuracy*). In total, the measurements reflected on Attachment A are more than adequate to allow this Commission and the CLECs to verify that BellSouth is complying with its obligation to provide nondiscriminatory access to CLECs in Louisiana.

**I. BELLSOUTH'S PERFORMANCE MEASUREMENTS HAVE EVOLVED SUBSTANTIALLY WITH INPUT FROM CLECS AND COMMISSIONS.**

The interim measures proposed by BellSouth on April 30, 1998 and adopted by the LPSC on July 1, 1998 were not written on a clean slate; they are the culmination of many months of work by BellSouth with input from CLECs and regulatory bodies. The current set of measurements supported by BellSouth take into consideration direct CLEC input over the past year, including negotiations and arbitrations with CLECs, the May 6, 1998 order issued by the Georgia Public Service Commission in Docket No. 7892-U (the "Georgia Performance Measurements Order"), the Department of Justice Comments issued in various Section 271 proceedings, and the Federal Communications Commission's ("FCC") Notice of Proposed Rule Making ("NPRM") on Performance Measurements issued in April of this year (the "FCC NPRM").



**A. BellSouth's Measurements Incorporate Measurements Included in AT&T Arbitration Docket No. 22145**

The service quality issue was first raised in Louisiana in 1996 during the course of the AT&T arbitration (Docket No. U-22145), wherein AT&T argued for adoption of its proposed list of Direct Measures of Quality ("DMOQs"), and for submission of monthly management reports by BellSouth to AT&T.<sup>1</sup> BellSouth argued against adoption of AT&T's DMOQs, stating that it would work with AT&T and other CLECs over the next six months to develop mutually agreeable quality measurements concerning ordering, installation and repair items, including but not limited to interconnection facilities, 911/E911 access, provision of requested unbundled elements and access to databases. If the parties could not reach agreement on the measurements, BellSouth contended that either party could seek relief from the Commission at that time.<sup>2</sup>

The LPSC declined to adopt AT&T's proposed measurements, finding that AT&T had failed to show that the comprehensive service quality standards in the Commission's General Order dated March 15, 1996 were insufficient and that, accordingly, "no additional regulations relative to service quality appear[ed] to be necessary at present."<sup>3</sup> Thereafter, the parties did work together to develop performance measurements, and on May 9, 1997 reached agreement on measurements that were incorporated into the agreement submitted by the parties in July of 1997 and approved by the Commission. The parties further agreed to continue negotiating other measurements and specific performance targets once AT&T-specific data were collected for

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<sup>1</sup> See also Georgia Performance Measurement Order, at p. 10.

<sup>2</sup> See Order No. U-22145, 1/28/97, at p. 8.

<sup>3</sup> *Id.* at p. 9; see also Georgia Performance Measurement Order, p. 10-11 (existing service quality rules appropriate until BellSouth and AT&T mutually develop additional measurements).

analysis by both parties. AT&T has been receiving performance measurement reports in accordance with its agreement with BellSouth since August, 1997.<sup>4</sup>

**B. BellSouth's Measurements Include the Measurements Recently Adopted in the Georgia Performance Measurements Proceeding**

The measurements negotiated with AT&T and other CLECs formed the basis of BellSouth's proposed performance measurements in the generic docket opened by the Georgia Commission in August 1997. In that proceeding, most intervenors supported the performance measurements, reporting requirements and default performance standards adopted by the Local Competition Users Group ("LCUG").<sup>5</sup> BellSouth opposed many of the measurements sponsored in the LCUG, including measurements subsequently adopted by the Georgia Commission and incorporated in BellSouth's April 30, 1998 Louisiana filing. For example, BellSouth contested the need for the following measurements that are now included in the interim measurements: *Service Order Accuracy*, *Percent Flow Through*, and *Billing Quality and Accuracy*. The final Performance Measurements adopted by the Georgia Commission on May 6, 1998 were derived from various sources: As stated by the Georgia Commission:

the Commission finds that a performance measurement plan adopted in Georgia should include measurements specifically identified by the FCC as necessary to their review. Therefore, the measurements adopted by the Commission address recent concerns raised by the Department of Justice and the Federal Communications Commission regarding performance measures in the context of a Section 271 Application by another Bell Operating Company.

....

There was much overlap between the various proposals, and most intervenors expressly supported the LCUG document. The measurements adopted by the Commission include some of those proposed by BellSouth, which contained terms and conditions BellSouth

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<sup>4</sup> Other CLECs, for example, MCI Metro, adopted the AT&T-negotiated performance measurements into their interconnection agreements in Louisiana.

<sup>5</sup> LCUG is comprised of AT&T, Sprint, MCI, LCI, and WorldCom. See FCC NPRM, p. 10, n.22. The LCUG document sponsored by these parties in the Georgia proceeding was the same Version 6.1 submitted by them to the FCC in CC Docket No. 98-56. *Id.* at n. 23.

had previously negotiated with AT&T, U.S.South, and Time Warner, as well as certain measurements contained in the LCUG proposal which addressed particular problem areas. These measurements were also selected to address the areas identified by the FCC as deficient in §271 applications made by other Bell companies.<sup>6</sup>

BellSouth's performance measurements, as adopted on an interim basis by this Commission, incorporate the measurements in the Georgia Order, and more. They include 13 additional measurements not required by the Georgia Commission. These additional measurements include:

Ordering

- \* Speed of Answer in Ordering Center

Provisioning

- \* Order Completion Interval Distribution

Maintenance & Repair

- \* Maintenance Average Duration
- \* Average Answer Time - Repair Center
- \* Average OSS Response Interval
- \* OSS Interface Availability

Billing

- \* Usage Data Delivery Timeliness and Completeness
- \* Usage Data Delivery Accuracy

E911

- \* Timeliness
- \* Accuracy

Trunk Group Performance

- \* Comparative Trunk Group Service Summary
- \* Trunk Group Service Report
- \* Trunk Group Service Detail

These additional measurements were incorporated, among other reasons, to address concerns raised by the FCC in its NPRM on Performance Measurements and in other proceedings.

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<sup>6</sup> See Georgia Performance Measurements Order, 5/6/98, at pp. 14 & 15-16.

**C. BellSouth's Measurements Include Measurements Proposed by the FCC in Its Recent NPRM on Performance Measurements**

On May 30, 1997, LCI International Telecom Corp. ("LCI") and the Competitive Telecommunications Association ("CompTel") jointly filed a petition asking the Commission to initiate a rulemaking proceeding to establish: (1) performance measurements and reporting requirements for the provision of OSS functions; (2) default performance standards or benchmarks that would apply when an ILEC fails or refuses to report on its performance; (3) technical standards for OSS interfaces; (4) and remedial provisions that would apply to non-compliant ILECs. In their petition, LCI/CompTel proposed that the Commission rely on the Service Quality Measurements adopted by the LCUG as the basis for establishing performance measurements, reporting requirements, and default performance standards. On October 8, 1997, the LCUG filed a revised proposal -- Version 6.1 -- that described in greater detail its proposed performance measurements and default standards.

On April 17, 1998, the FCC released an NPRM that proposed a set of measurements "by which to analyze whether new providers of local telephone service are able to access, among other things, the support functions (that is, the functions provided by computer systems, databases, and personnel) of incumbent local telephone companies in a nondiscriminatory and just and reasonable manner consistent with the Telecommunications Act of 1996 (1996 Act) requirements."<sup>7</sup> The FCC stated as follows:

The measurements we propose in this Notice are designed to assist in assessing an incumbent LEC's performance in providing OSS, interconnection, and OS/DA to competing carriers. Various parties presented proposals for performance measurements in this proceeding. We conclude, however, that no single proposal optimally balances our goals of detecting possible instances of discrimination, while minimizing, to the extent possible, burdens imposed on incumbent LECs. We therefore propose a set of

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<sup>7</sup> See FCC NPRM, p. 4, ¶ 4.

measurements that we believe provides an appropriate balance of these goals. We seek to limit the burden on incumbent LECs by minimizing the levels of disaggregation for reporting purposes. We have also chosen not to propose measurements that we believe may be particularly burdensome on incumbent LECs.

FCC NPRM, p. 15, ¶ 31 (emphasis added).

Attachment C to these Comments is a matrix that compares the measurements proposed by the FCC, the measurements proposed in the LCUG, the measurements adopted by the Georgia Commission, and the BellSouth measurements. This matrix demonstrates that BellSouth's interim measurements not only exceed measurements ordered by the Georgia Commission, but also are substantially the same as, or more comprehensive than, those proposed by the FCC.<sup>8</sup>

The measurements set forth in Attachment A far exceed those necessary under the Act, and there is no basis for adopting additional measures. At a minimum, BellSouth submits that prior to adopting further requirements in this area, the Commission should monitor data received under the interim measures for a period of time in order to make a more informed judgment about the need for additional -- or indeed less -- measures.

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<sup>8</sup> A review of the Comments filed by the Intervenor in May of 1998 shows that not a single one had any substantive problem with BellSouth's proposed measurements. For example, MCI stated several times that the proposed measurements "were a step in the right direction." Sprint commended BellSouth "for the progress it has made in this area." Intervenor seeks rather to maximize the burdens on ILECs by imposing further unnecessary measurements, and by seeking reporting of existing measurements on an unreasonably disaggregated basis. See discussion at text, *infra* at p. 24-27.

**II. THE LPSC'S INTERIM MEASUREMENTS ARE MORE THAN ADEQUATE TO PERMIT MONITORING OF BELL SOUTH'S PERFORMANCE AND COMPLIANCE WITH ITS OBLIGATIONS.**

**A. Congress and the FCC Have Articulated the Appropriate Standards by Which BellSouth's Performance Should Be Measured.**

The Telecommunications Act of 1996, and applicable FCC orders issued pursuant to that Act, obligate ILECs to provide non-discriminatory physical interconnection to their networks for facilities-based carriers; and non-discriminatory access to resold services and unbundled network elements for other providers, which involves primarily access to BellSouth's Operating Support Systems ("OSS"). There are essentially three standards by which an ILEC's compliance with these obligations should be measured.

- ◆ For those OSS functions that BellSouth itself uses in the provision of its retail services, BellSouth must provide access that is equivalent to the level of access that it provides itself in terms of quality, accuracy, and timeliness; that is, access that allows CLECs to make use of functions in substantially the same time and manner as used by the ILEC.
- ◆ For those functions that have no BellSouth retail analog, BellSouth must provide access to functions that is sufficient to allow an efficient competitor a meaningful opportunity to compete.
- ◆ Finally, BellSouth must provide physical interconnection to its network for facilities-based carriers that is at a level of quality that is at least indistinguishable from that which the ILEC provides itself, a subsidiary, an affiliate, or any other party.

The FCC discussed these standards in its recent NPRM on Performance Measurements.<sup>9</sup> As a practical matter, the FCC concluded that, for those OSS functions provided to competing carriers that are analogous to OSS functions that an ILEC provides itself in connection with retail service offerings, the ILEC must provide access to competing carriers that is “equivalent to the level of access that the incumbent LEC provides itself in terms of quality, accuracy, and timeliness.” Thus, for example, for those functions that an ILEC itself accesses electronically, the ILEC must provide electronic access for CLECs. In addition, competing carriers must have access to OSS functions that allows them to make use of such functions in “substantially the same time and manner” as the ILEC. For those OSS functions that have no direct retail analog, such as ordering and provisioning of unbundled network elements, an ILEC must provide access “sufficient to allow an efficient competitor a meaningful opportunity to compete.”<sup>10</sup>

With respect to interconnection, the FCC has concluded that section 251(c)(2)(C) requires an ILEC to provide interconnection between its network and that of a requesting carrier “at a level of quality that is at least indistinguishable from that which the ILEC provides itself, a subsidiary, an affiliate, or any other party”.<sup>11</sup>

**B. BellSouth’s Measurements Provide the Data Necessary to Assess Its Performance Under the Appropriate Standards.**

The Service Quality Measurements reflected in Attachment A are divided into nine categories: (1) Pre-Ordering and Ordering OSS (2) Ordering; (3) Provisioning; (4) Maintenance and Repair; (5) Billing; (6) Operator Services and Directory Assistance; (7) E911; (8) Local Interconnection Trunk Group Blockage; and (9) Collocation. These measurements are

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<sup>9</sup> See FCC NPRM, ¶28-30, at pp. 14-15.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

identical to the measurements proposed by BellSouth on April 30, 1998 and adopted by the LPSC, except that BellSouth now proposes to add six measurements of for ordering and collocation that were absent from its April 30th filing and to conform three April 30th measures to the format proposed by the FCC in its recent NPRM.

### **Pre-Ordering and Ordering OSS**

1. OSS Interface Availability. This function monitors how often the OSS pre-ordering supporting systems are actually available compared to how often the systems are scheduled to be available. This measurement is in the Georgia Order, the FCC proposed rule making, the LCUG and BellSouth's measurements, and there appears to be a consensus that it should be implemented in the manner proposed.

2. Average OSS Response Time. This function measures the time required for CLECs to obtain the pre-ordering information necessary to establish and modify service while the customer is on the line. It measures the speed with which the CLEC service representative receives information for processing a prospective order from the BellSouth supporting OSS system. As Attachment C shows, this measurement appears in the Georgia Order, the FCC proposed rule making, the LCUG and BellSouth's measurements, and there appears to be a consensus that it should be implemented in the manner proposed.

### **Ordering**

3. Percentage Rejected Orders. As ordered by the Georgia Commission, and proposed by the FCC in its NPRM, this function compares the number of orders rejected by



BellSouth to the total number of orders submitted. BellSouth does not provide this function to itself and thus there is no BellSouth analog. This measure has been implemented by BellSouth.<sup>12</sup>

4. Average Reject Notice Interval. This criteria measures the average time it takes for BellSouth to reject an order with an error.<sup>13</sup> BellSouth does not provide this function to itself and thus there is no BellSouth analog. Orders placed by BellSouth representatives are automatically edited before they leave the service representative position. According to the Georgia Order, BellSouth is required to report this data for orders with less than 10 lines/circuits and orders of more than 10 lines/circuits. Practically speaking, the value of this line/circuit data within the context of these three measurements is not clear. However, BellSouth has committed to and is continuing to work to implement these requirements. Aside from this segmentation issue, BellSouth has already implemented this measurement.

5. Average FOC Notice Interval. This measurement demonstrates that CLEC representatives receive confirmation of correct orders in a manner that enables them to effectively compete.<sup>14</sup> BellSouth has agreed to implement this measurement in the manner ordered by the Georgia Commission. As with the *Average Reject Notice Interval Measurement*, further work is being undertaken at this time to implement the measure in the reporting format required by that Commission.

6. Total Service Request Cycle Time. This measurement is included in the interim measurements adopted by this Commission. BellSouth proposes that it be eliminated

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<sup>12</sup> BellSouth has agreed to implement this measurement in the manner ordered by the Georgia Commission. As with the *FOC Timeliness and Average Reject Notice Interval Measurements*, further work is being undertaken now to implement the measure in the reporting format required by that Commission.

<sup>13</sup> See Georgia Performance Measurement Order, p. 18; LCUG, OP-5.

<sup>14</sup> See LCUG, OP-5.

because it is the combination of Order Completion Interval plus FOC Timeliness, both of which already exist as separate measurements. The FCC did not include this measurement in its NPRM, and did include Order Completion Interval and FOC Timeliness (as does BellSouth).

7. Service Request Submissions Per Requests. This measurement is included in the interim measurements adopted by this Commission. BellSouth proposes that it be eliminated because it is the converse of *Reject Distribution Interval* which already exists. Retention of this measurement is thus redundant. The FCC did not include this measurement in its NPRM.

8. Average Jeopardy Notice Interval and Percentage Orders Given Jeopardy Notice. These items measure the time and frequency with which BellSouth provides jeopardy notices to CLECs. Jeopardy notices are issued when there is a potential problem with filling an order. They are issued on an *ad hoc* basis to signal a need to focus on the order. Issuance of an order jeopardy is not synonymous with a likelihood that the order will not be filled on time. Moreover, there is no retail analog for issuance of jeopardy notices. For these reasons, BellSouth argued in the Georgia proceeding that these proposed measures be omitted in favor of the "*Percent Due Dates Missed*" and "*Average Completion Interval*" measures, which do have retail analogs. These alternative measures reveal whether due dates are missed more frequently for CLECs than ILECs, and provide the information necessary to detect whether a substantive problem of disparate treatment exists.

These measurements were not required by the Georgia Commission in its recent order, and were not included in the interim measures adopted by the LPSC on July 1st on April 30th. Some of the Intervenors criticized BellSouth's proposed measurements because they did not

include these measures. Rather than reiterate its previous arguments, BellSouth is now proposing to add these measurements.

9. Coordinated Customer Conversions. This is a new measurement that BellSouth proposes to add. It measures the average time it takes to disconnect an unbundled loop from the BellSouth switch and cross connect it to the CLEC's equipment. It applies only where the CLEC specifically requests a coordinated cut-over.<sup>15</sup>

10. Average Completion Notice Interval. This is an additional measurement BellSouth proposes to put into place. It measures the amount of time it takes an ILEC to send a CLEC notice that work on an order has been completed. This measurement was not required by the Georgia Commission and was not included in BellSouth's April 30th filing. The measurement is contained in the LCUG and the proposed FCC rules, and BellSouth now proposes to implement this measure.

11. Percentage Order Flow Through. This function compares the number of service orders that flow through the ordering processes without manual intervention to the total number of completed orders. It was required by the Georgia Commission and is part of the FCC's proposed rules. It is part of the Louisiana interim measurements, has been implemented by BellSouth, and should be retained.

#### Provisioning.

12. Average Completed Interval. This function measures how long it takes BellSouth to complete an order after BellSouth accepts an order from the CLEC.<sup>16</sup>

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<sup>15</sup> The Georgia Performance Measurement Order does not include this measurement, but rather defines a standard for this interval. See Georgia Performance Measurement Order, at p. 25.

<sup>16</sup> See LCUG, OP-1. This measure does not require BellSouth to count rejected orders.

It is required by the Georgia Commission and proposed in the FCC rule making and there appears to be a consensus that it should be implemented.

The measurement in the Georgia Order allows for the exclusion of orders where customer requested due dates are beyond the offered interval. BellSouth does not have the capability today to capture these orders and exclude them from the measurement. BellSouth will continue its effort, however, to implement this measurement as provided for in the Georgia Order and in the interim will provide reports for this measurement that includes this type of data.

13. Order Completion Interval Distribution. This measure monitors the reliability of BellSouth's commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customers. It is not included in the Georgia Performance Measurement Order and is included in the FCC's NPRM. This interim measurement should be retained.

14. Average Interval for Held Orders. This function measures the average time in which an order is held in a non-completed state. It is a measurement required by the Georgia Commission and proposed in the FCC's rule making and has been implemented by BellSouth. In fact, BellSouth's implementation of this measure goes beyond that required by the Georgia Commission. The LCUG breaks down this measurement into two sub-categories: (1) percentage of orders held over 90 days; and (2) percentage of orders held over 15 days. BellSouth's measurements incorporate this subdivision of measurement.<sup>17</sup>

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<sup>17</sup> To the extent that footnote 2 of the Georgia order requires that this measurement be reported based on the number of lines in an order, BellSouth is not presently capable of reporting Held Order Intervals on this basis. BellSouth has committed, however, to continue to work to implement this order as set forth in footnote 2 in the next 90-120 days.

15. Speed of Answer in Ordering Center. The Georgia Commission did not impose a measurement related to the time it takes a CLEC to get through to the CLEC ordering center. The FCC does propose such a measurement and the interim measurements provide one. Under this measurement, BellSouth measures the total time in seconds to reach the CLEC ordering center as a percentage of the total number of calls.

16. Percentage Due Dates or Installations Missed. This measurement compares the number of missed installation appointments to the total number of installation appointments completed during a reporting period. This function monitors the reliability of BellSouth estimates with respect to committed due dates, and demonstrates to what extent CLECs can accurately quote installation dates to their customers. It is a measurement required by the Georgia Commission, proposed by the FCC in its rule making and included in Louisiana's interim measurements.

17. Percentage Provisioning Troubles Within 30 Days of Installation. This measure monitors both the quality and accuracy of installation activities. It is a measurement required by the Georgia Commission, proposed by the FCC in its rulemaking and included in Louisiana as an interim measurement. It should be retained.

18. Percentage Order Accuracy. Order accuracy measures how precisely BellSouth provisions CLEC orders. This measurement was ordered by the Georgia Commission over BellSouth's objection, and is included in the Louisiana interim measurements. The FCC has not incorporated this measurement in its rule making, reasoning that an appropriate surrogate for this measurement is an alternative measurement that is already implemented by

BellSouth -- the *Percentage Provisioning Troubles within 30 days* measurement.<sup>18</sup> BellSouth agrees with the FCC rationale and urges the LPSC to eliminate this onerous measurement. In the interim, BellSouth will capture data under this measurements.

Appendix A to the Georgia Order appears to require that every order be analyzed in order to calculate the measurement objective, apparently under the mistaken assumption that BellSouth currently has a mechanized process to perform this task. BellSouth had already implemented this measurement, calculating order accuracy by using statistically valid samples. Although BellSouth is currently investigating implementation of a process that reviews every order, as requested by the Georgia PSC, it is abundantly clear that this will be an extremely labor intensive and costly process, at least in the short term. Moreover, review of 100% of the orders, as opposed to a statistically valid sample, may not result in a more accurate measurement. In the event the LPSC decides to retain this measurement, BellSouth urges the Commission to endorse a methodology that permits use of statistically valid samples.

#### **Maintenance and Repair.**

19. OSS Interface Availability (Maintenance and Repair). This measurement is included in the Louisiana interim measurements, although it is not required by the Georgia Commission or proposed to be required by the FCC. BellSouth measures the actual availability of the OSS repair interfaces versus the scheduled availability, and proposes to retain this measurement.

20. Average OSS Response Interval (Maintenance and Repair). This measurement also is included in the Louisiana interim measurements, although it is not required

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<sup>18</sup> See FCC NPRM, ¶68, at p. 33.

by the Georgia Commission or proposed to be required by the FCC. BellSouth measures CLEC access time to its OSS repair interfaces in increments of (less than or equal to four seconds, greater than or equal to in four seconds), (less than or equal to 10 seconds and greater than 10 seconds), and (greater than 30 seconds). BellSouth proposes to retain this interim measurement.

21. Percentage of Missed Repair Appointments. This function compares the number of troubles that have not been cleared by the quoted resolution time and date to the total number of customer trouble tickets closed during the reporting period. It is required by the Georgia Commission and analogous to the LCUG measurement of percentage of customer troubles resolved within estimate. It is incorporated into the Louisiana Interim Measurements and should be permanently adopted.

22. Maintenance Average Duration. This measure, when collected for both the CLEC and BellSouth and compared, ensures that CLEC maintenance requests are cleared comparably to BellSouth maintenance requests. It is a measurement required by the Georgia Commission, proposed by the FCC in its rule making and included in the interim measurements/

23. Percentage Repeat Troubles within 30 days. This measurement measures how often troubles are not resolved the first time they are reported. (See LCUG, Mr-2). It is a Georgia Commission requirement, as well as a proposed FCC rule. It should be permanently adopted by this Commission in the form proposed by BellSouth.

24. Customer Trouble Rate Report (or Frequency of Repeat Troubles). Customer trouble rate reports compare the number of troubles reported with the number of access lines in service during the reporting period.<sup>19</sup> The information provided by this measurement

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<sup>19</sup> See LCUG, MR-3.

demonstrates whether CLEC customers experience troubles more often than do BellSouth's customers. The DOJ has stated that the trouble report rate is the most important measure of service reliability and historically positively correlates with an end-user's perception of their local service provider. This measure is required by the Georgia Order, proposed by the FCC in its rule making and incorporated into Louisiana's Interim Measurements.

25. Out of Service More than 24 Hours. This measurement compares the number of out of service troubles cleared in excess of 24 hours to the total number of out of service troubles cleared during a reporting period and reflects on timeliness of repair support. It is required by the Georgia Commission, but is not contained in either LCUG or the FCC proposed rules. It is incorporated into the interim measurements and should be permanently adopted.

26. Average Answer Time-Repair Center. This interim requirement measures the average answer time for CLEC queries into BellSouth repair centers. BellSouth voluntarily collects this data, which is not required by the Georgia Commission nor proposed to be required by the FCC.

#### **Billing.**

The FCC proposed rule making contains only two billing measurements: the *Average Time to Provide Usage Records* and the *Average Time to Deliver Invoices*. The Georgia Order requires an invoice timeliness measure (although not an average time to provide usage records) and a measure of Invoice Accuracy. The LCUG proposes use of each of these measurements, plus a *Percentage Usage Accuracy* measure. The Louisiana Interim Measurements contain all of



these measurements, as well as an additional measurement for *Usage Data Delivery Completeness*.

27. Invoice Timeliness. This criteria measures how quickly BellSouth responds to the scheduled close of the billing cycle. It has been implemented by BellSouth, and should be retained.

28. Usage Data Delivery, Timeliness & Completeness. This measurement demonstrates the level of quality and timeliness of processing and transmission of both types of usage data (BellSouth recorded and usage recorded by other carriers) to the appropriate CLEC. This measurement was not required or addressed by the Georgia Commission, and the FCC only proposed the timeliness portion of this measure. It is included as an interim measurement, and BellSouth is willing to retain it.

29. Usage Data Delivery Accuracy. This measurement captures the percentage of recorded usage and recorded usage data packets transmitted error free and in an agreed upon format to the appropriate CLEC, and is a parity measurement against BellSouth's Data Packet Transmission. It was not required or addressed by the Georgia Commission nor by the FCC. It is included as an interim measurement, and BellSouth is willing to retain it.

30. Invoice Accuracy. Invoice accuracy assesses the quality of billing support BellSouth provides to the CLECs.<sup>20</sup> BellSouth has previously measured this function by using data relating to the revenue that is adjusted in the invoice process on a monthly basis. The Georgia Commission required that this measurement be implemented by taking the total number of correct invoices (complete information, reflecting accurate calculations, and properly

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<sup>20</sup> See LCUG, BI-3.